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FEDERAL COMMUNICATIONS COMMISSION
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	
Amendment of Part 90 of the Commission's Rules to Adopt Regulations for Automatic Vehicle Monitoring Systems	PR Docket No. 93-61 RM-8013

COMMENTS OF SPECTRALINK CORPORATION

SpectraLink Corporation ("SpectraLink") hereby submits these comments in opposition to the Commission's Notice of Proposed Rulemaking[1/] proposing to establish permanent automatic vehicle monitoring ("AVM") system rules in the 902-928 MHz band. As a member of the Part 15 Coalition,[2/] SpectraLink endorses wholly the views contained in, and is signatory to, the Part 15 Coalition comments being concurrently filed. Nevertheless, SpectraLink files these comments separately to further express its views on a number of limited issues.

1/ *Notice of Proposed Rulemaking*, FCC 93-141, 58 Fed. Reg. 21276 (released April 9, 1993)

2/ The Part 15 Coalition represents over 30 companies involved in the development and marketing of unlicensed wireless products designed to operate under the Commission's Part 15 Rules.

I. INTRODUCTION

SpectraLink was organized in 1990 to meet the existing market demand for a communications product that could provide wireless telephone communications as an adjunct to the business community's existing PBX and Centrex telephone systems. From its inception, SpectraLink has invested substantial amounts of money and energy designing, manufacturing, and marketing the SpectraLink 2000 Pocket Communications System ("PCS-2000"). PCS-2000 is an indoor cellular telephone system designed to function as an extension of the individual's desk phone. PCS-2000 operates in the 902-928 MHz frequency band as a spread spectrum radio frequency device pursuant to Part 15 of the Commission's Rules. Because SpectraLink's product conforms with the FCC's Part 15 Rules and regulations for unlicensed use, it meets the business community's market demand for uncomplicated, reasonably priced, reliable, high-quality wireless telephony today.

The Commission's Notice, prompted by a Petition for Rulemaking filed by North American Teletrac and Location Technologies, proposes to adopt permanent AVM rules,[3/] and expand the definition of AVM systems to include the location and monitoring of inanimate objects. The Commission posits that adoption of permanent AVM rules will promote the efficient operation and continuing growth of AVM systems.[4/] While SpectraLink understands the Commission's zeal to encourage the

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[3/] AVM systems have been governed by interim rules since 1974. *See* Report and Order, 30 RR 2d. 1665 (1974).

[4/] *Notice of Proposed Rulemaking*, *supra* at ¶ 1.

development of new technologies, SpectraLink believes that promoting the "continued growth" of AVM technologies at the expense of the Part 15 industry is contrary to the public interest. Accordingly, SpectraLink urges the Commission to maintain the status quo, or in the alternative, adopt certain measures to protect the Part 15 industry from indiscriminate claims of harmful interference from AVM operators in the 902-928 MHz band.

II. AVM OPERATORS SHOULD BE COMPELLED TO MAKE A SPECIFIC SHOWING OF HARMFUL INTERFERENCE BEFORE A PART 15 DEVICE IS REQUIRED TO CEASE OPERATING IN THE 902-928 MHz BAND.

The Commission's Notice correctly notes the undisputed utility of Part 15 devices to the U.S. commercial and consumer markets and solicits comment on potential solutions to Part 15 interference concerns. In SpectraLink's view, the Commission can resolve the potential Part 15 device interference issue by simply declining to authorize AVM technologies with highly sensitive receiver designs to operate in the 902-928 MHz band. For example, as designed, the automatic gain circuitry of Teletrac's AVM system receiver will detect any radio signal and decrease its sensitivity so that strong signals will not distort the systems location information, and weak signals will be amplified. As a consequence, the mere presence of a radio device operating in the 902-928 MHz band, even if it does not cause "harmful interference," will be detected by Teletrac's system.

Given this highly sensitive receiver design and AVM systems' primacy over unlicensed Part 15 operations in the 902-928 MHz band, SpectraLink is concerned that AVM operators may simply patrol their coverage areas and force all compliant Part 15

devices and/or systems in an area to shut down on the mere suspicion of potential harmful interference. SpectraLink understands that the Commission's proposed rules are not intended to eliminate the operation of Part 15 devices in the 902-928 MHz band. Accordingly, SpectraLink urges the Commission to accommodate Part 15 devices by requiring Teletrac (and other AVM system operators) to make a compelling showing of specific interference before a Part 15 device or system would be required to cease operating in the shared spectrum (902-928 MHz) band.

III. ALTERNATIVELOCATION AND MONITORING SYSTEM TECHNOLOGIES WOULD FACILITATETHE COEXISTENCE OF PART 15 DEVICES IN THE SAME SPECTRUM BAND.

SpectraLink concurs with the Part 15 Coalition view that alternative location and monitoring technologies that would allow the peaceful coexistence of Part 15 devices in the 902-928 MHz band are currently available. For example, Trimble Navigation of Sunnyvale, California currently manufactures products that integrate Global Positioning System ("GPS") receivers and cellular or trunked radio transmitters. In SpectraLink's view, GPS systems are substantially more accurate than AVM technologies and make more efficient use of finite spectrum. Because cellular radio and GPS receiver technologies have already been approved for use by the Commission, unlike the highly sensitive systems proposed in the Notice, the integration of these technologies for advanced location and monitoring functions would not require the establishment of new permanent rules.

IV. A JOINT TECHNICAL COMMITTEE SHOULD BE CREATED TO

technical committee to address interference concerns and compelling AVM operators to make a specific showing of interference prior to requiring Part 15 operators to cease operations in the 902-928 MHz band.

Respectfully Submitted,

SPECTRALINK CORPORATION

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